

FILED

May 24, 2023

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: MV
Deputy

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS HUMBERTO RICHARD
WALSH,

Defendant.

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SEALED Case No: EP:23-CR-01039-DCG**INDICTMENT****CT 1: 18 U.S.C. § 2243(a)—Sexual Abuse
of a Minor*****Notice of Government's Demand for
Forfeiture***

THE GRAND JURY CHARGES THAT:

**COUNT ONE
18 U.S.C. § 2243(a)
Sexual Abuse of a Minor**

Beginning on or October 1, 2022, and continuing to and including on or about January 24, 2023, in the Western District of Texas, and at a place within the special maritime and territorial jurisdiction of the United States as defined in Title 18, United States Code, Section 7(3), on land reserved and acquired for the use of the United States, to wit: Fort Bliss, Texas, the Defendant,

CARLOS HUMBERTO RICHARD WALSH,

did knowingly engage in a sexual act., to wit, contact between the penis and the vulva, with B.S., who had attained the age of 12 years but had not attained the age of 16 years and was at least four years younger than the defendant, all in violation of Title 18 United States Code Section § 2243(a).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Sexual Abuse of a Minor Violation and Forfeiture Statutes
[Title 18 U.S.C. § 2243(a), subject to forfeiture pursuant to
Title 18 U.S.C. §§ 2253(a)(2) and (3)]

As a result of the criminal violations set forth above, the United States gives notice of its intent to seek the forfeiture of certain properties from Defendant **CARLOS HUMBERTO RICHARD WALSH**, including but not limited to computer(s), electronic equipment, accessories, and devices upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. §§ 2253(a)(2) and (3), which state:

Title 18 U.S.C. § 2253. Criminal Forfeiture

* * *

(a) Property subject to criminal forfeiture. - A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2251B of this chapter, or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in-

* * *

(2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

(3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

This Notice of Demand for Forfeiture includes but is not limited to the:

1. **iPhone 13 Pro Mex cell phone, bearing IMSI: 310280064203966; and**
2. **Any and all property and/or accessories involved in or used in the commission of the criminal offense.**

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

JAIME ESPARZA
UNITED STATES ATTORNEY

BY:



Assistant U.S. Attorney